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9 Attorneys for Plaintiff

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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION
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15 UNITED STATES OF AMERICA,) No. CR 11-0536 WHA
16 Plaintiff,)
17 v.) STIPULATION AND ~~PROPOSED~~ ORDER
18) CONTINUING MATTER AND EXCLUDING
19 JOSEPH PERKINS,) TIME UNDER 18 U.S.C. § 3161
20 Defendant.)
21 _____)

22 On October 11, 2011, the parties made their initial appearance before the Court. The
23 parties requested, and the Court ordered, a continuance until November 1, 2011, on which date
24 the parties anticipate a change of plea. The stated purpose of the continuance request was to
25 afford defense counsel adequate time to prepare.

26 The parties also requested, and the Court ordered, that the time between October 11 and
27 November 1, 2011, would be excluded from the running of the speedy trial clock for effective
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1 preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that, taking into
2 account the public interest in prompt disposition of criminal cases, good cause exists for this
3 extension. The parties also agreed that the ends of justice served by granting such a continuance
4 outweighed the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
5 3161(h)(7)(A).

6 SO STIPULATED:

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8 MELINDA HAAG
United States Attorney

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10 DATED: October 17, 2011

/s/
11 BENJAMIN P. TOLKOFF
Assistant United States Attorney


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13 DATED: October 17, 2011

/s/
14 RONALD TYLER
Attorney for JOSEPH PERKINS

15 For the reasons stated above, this matter is continued until November 1, 2011, for a
16 change of plea or trial setting. The Court finds that the exclusion of time from October 11,
17 through November 1, 2011 is warranted and that the ends of justice served by the continuance
18 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161
19 (h)(7)(A). The failure to grant the requested continuance would deny the defendant effective
20 preparation of counsel and would result in a miscarriage of justice. 18 U.S.C. §
21 3161(h)(7)(B)(iv).

22 SO ORDERED.

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24 DATED: November 18, 2011.


25 William Alsup
26 UNITED STATES DISTRICT JUDGE
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